



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2891

DATE SCANNED 7/22/15

SCANNER NO. 2

SCAN OPERATOR Jh



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2014 DEC 15 AM 9:25

December 15, 2014

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *for PCO*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Sari Pickeral *KDR*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2014 12 Day Pre-General Report  
(Unauthorized Committees – Monthly Filers) for the Administrative Fine  
Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2014 12 Day Pre-General Report in accordance with 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)). The 12 Day Pre-General Report was due on October 23, 2014 and the General Election was held on November 4, 2014. The list is comprised of unauthorized committees that file monthly.

The committees listed on the attached RTB Circulation Report either filed the election sensitive report after the due date, failed to file the report or failed to file the report prior to four (4) days before the General Election (considered a non-filed report). In accordance with the schedule of civil money penalties at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)) and make a

preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.

2. Send the appropriate letters.

14000004-1M0

Federal Election Commission  
Reason to Believe Circulation Report  
2014 PRE-GENERAL Election Sensitive 10/23/2014 UNAUTH\_M

System#	Committee ID	Committee Name	Cand ID	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2881	C00395723	ALSTON & BIRD PAC			DENNIS O. GARRIS	\$804,182	0	11/3/2014	Not Filed	\$1,450	\$550
2882	C00531764	ANN PAC			PATRICK MCSWAIN	\$448,141	0	11/14/2014	Not Filed	\$18,794	\$1,090
2883	C00270967	CAPITAL BLUEPAC, THE POLITICAL ACTION COMMITTEE OF CAPITAL BLUECROSS			ROBERT BAKER	\$199,852	1	11/5/2014	Not Filed	\$2,535	\$687
2884	C00279802	CONSTITUTION PARTY NATIONAL COMMITTEE			H. JAMES HEADINGS	\$276,634	0	11/29/2014	Not Filed	\$5,785	\$660
2885	C00147231	CROWLEY MARITIME CORPORATION FEDERAL PAC			DANIEL L. WARNER	\$184,477	0	11/13/2014	Not Filed	\$1,301	\$550
2886	C00422501	CSL BEHRING EMPLOYEES POLITICAL ACTION COMMITTEE			PATRICK COLLINS	\$132,240	0	11/3/2014	Not Filed	\$4,332	\$550
2887	C00212308	DUCHOSSOIS GROUP PAC			MICHAEL E. FLANNERY	\$107,244	0		Not Filed	\$5,644 (est)	\$660
2888	C00163535	IRONWORKERS LOCAL 401 POLITICAL ACTION FUND			STEPHEN SWEENEY	\$529,452	0	11/13/2014	Not Filed	\$11,000	\$1,090
2889	C00046857	OAKLAND COUNTY DEMOCRATIC PARTY			ALEXANDER G. FIKE	\$2,816,221	4	11/10/2014	Not Filed	\$80,869	\$8,800
2890	C00270934	STARK COUNTY REPUBLICAN PARTY			JOYCE HUDNELL	\$540,670	0	11/4/2014	Not Filed	\$1,947	\$550
2891	C00200139	THE HERSHEY COMPANY POLITICAL ACTION COMMITTEE			RICHARD G. RUSSELL	\$120,723	0	10/30/2014	7	\$2,029	\$125

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 Reason To Believe Recommendation - 2014 )  
 12 Day Pre-General Report (Unauthorized )  
 Committees - Monthly Filers) for the )  
 Administrative Fine Program: )  
 ALSTON & BIRD PAC, and GARRIS, ) AF# 2881  
 DENNIS O. as treasurer; )  
 ANN PAC, and MCSWAIN, PATRICK as ) AF# 2882  
 treasurer; )  
 CAPITAL BLUEPAC, THE POLITICAL ) AF# 2883  
 ACTION COMMITTEE OF CAPITAL )  
 BLUECROSS, and BAKER, ROBERT as )  
 treasurer; )  
 CONSTITUTION PARTY NATIONAL ) AF# 2884  
 COMMITTEE, and HEADINGS, H. )  
 JAMES as treasurer; )  
 CROWLEY MARITIME CORPORATION ) AF# 2885  
 FEDERAL PAC, and WARNER, DANIEL )  
 L. MR. as treasurer; )  
 CSL BEHRING EMPLOYEES ) AF# 2886  
 POLITICAL ACTION COMMITTEE, and )  
 PATRICK COLLINS as treasurer; )  
 DUCHOSSOIS GROUP PAC, and ) AF# 2887  
 FLANNERY, MICHAEL E. as treasurer; )  
 IRONWORKERS LOCAL 401 ) AF# 2888  
 POLITICAL ACTION FUND, and )  
 SWEENEY, STEPHEN as treasurer; )  
 OAKLAND COUNTY DEMOCRATIC ) AF# 2889  
 PARTY, and FIKE, ALEXANDER G. as )  
 treasurer; )  
 STARK COUNTY REPUBLICAN ) AF# 2890  
 PARTY, and HUDNELL, JOYCE as )  
 treasurer; )  
 THE HERSHEY COMPANY POLITICAL ) AF# 2891  
 ACTION COMMITTEE, and RICHARD G )  
 RUSSELL as treasurer; )

11-03020-04-11-11

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 17, 2014 the Commission took the following actions on the Reason To Believe Recommendation - 2014 12 Day Pre-General Report (Unauthorized Committees - Monthly Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated December 15, 2014, on the following committees:

AF#2881 Decided by a vote of 6-0 to: (1) find reason to believe that ALSTON & BIRD PAC, and GARRIS, DENNIS O. as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2882 Decided by a vote of 6-0 to: (1) find reason to believe that ANN PAC, and MCSWAIN, PATRICK as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2883 Decided by a vote of 6-0 to: (1) find reason to believe that CAPITAL BLUEPAC, THE POLITICAL ACTION COMMITTEE OF CAPITAL BLUECROSS, and BAKER, ROBERT as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2884 Decided by a vote of 6-0 to: (1) find reason to believe that CONSTITUTION PARTY NATIONAL COMMITTEE, and HEADINGS, H. JAMES as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2885 Decided by a vote of 6-0 to: (1) find reason to believe that CROWLEY MARITIME CORPORATION FEDERAL PAC, and WARNER, DANIEL L. MR. as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2886 Decided by a vote of 6-0 to: (1) find reason to believe that CSL BEHRING EMPLOYEES POLITICAL ACTION COMMITTEE, and PATRICK COLLINS as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2887 Decided by a vote of 6-0 to: (1) find reason to believe that DUCHOSSOIS GROUP PAC, and FLANNERY, MICHAEL E. as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2888 Decided by a vote of 6-0 to: (1) find reason to believe that IRONWORKERS LOCAL 401 POLITICAL ACTION FUND, and SWEENEY, STEPHEN as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2889 Decided by a vote of 6-0 to: (1) find reason to believe that OAKLAND COUNTY DEMOCRATIC PARTY, and FIKE, ALEXANDER G. as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2890 Decided by a vote of 6-0 to: (1) find reason to believe that STARK COUNTY REPUBLICAN PARTY, and HUDNELL, JOYCE as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2891 Decided by a vote of 6-0 to: (1) find reason to believe that THE HERSHEY COMPANY POLITICAL ACTION COMMITTEE, and RICHARD G RUSSELL as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make

a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

December 18, 2014

Date

Shawn Woodhead Werth

Shawn Woodhead Werth  
Secretary and Clerk of the Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 18, 2014

Richard G. Russell, in official capacity as Treasurer  
The Hershey Company Political Action Committee  
100 Crystal A Drive  
Hershey, PA 17033

C00200139  
AF#: 2891

Dear Mr. Russell:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period October 1, 2014 through October 15, 2014, shall be filed no later than October 23, 2014. 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). Records at the Federal Election Commission ("FEC") indicate that this report was filed on October 30, 2014, seven (7) days late.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). 52 U.S.C. § 30109(a)(4) (formerly 2 U.S.C. § 437g(a)(4)). On December 17, 2014, the FEC found that there is reason to believe ("RTB") that The Hershey Company Political Action Committee and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) by failing to file timely this report on or before October 23, 2014. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$125. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$125 is due within forty (40) days of the finding, or by January 26, 2015, and is based on these factors:

Election Sensitivity of Report: Election Sensitive  
Level of Activity: \$2,029  
Number of Days Late: 7  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your

committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or January 26, 2015. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 52 U.S.C. § 30109 (formerly 2 U.S.C. § 437g). 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that The Hershey Company Political Action Committee and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701. *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

### 3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### 4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

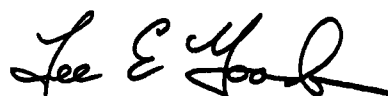
### 5. Settlement Offers

If you make a payment in an amount less than the calculated civil money penalty as an offer to settle or compromise a debt owed to the Commission, the offer is herewith rejected despite any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2) (formerly 2 U.S.C. § 437g(a)(2)). It will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) (formerly 2 U.S.C. § 437g(a)(4)(B)) and 30109(a)(12)(A) (formerly 437g(a)(12)(A)) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Lee E. Goodman  
Chairman

1-800-270-1130

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$125 for the 2014 Pre-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by January 26, 2015. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
-----

FOR: The Hershey Company Political Action Committee

FEC ID#: C00200139

AF#: 2891

PAYMENT DUE DATE: January 26, 2015

PAYMENT AMOUNT DUE: \$125



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2015 JUN 24 PM 12:51

June 24, 2015

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Sari Pickeral *KDP*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2014 12 Day Pre-General Report (Unauthorized Committees – Monthly  
Filers)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2014 12 Day Pre-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committee that has not paid the civil money penalty. The committee that has not paid has been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, three (3) committees detailed below designated a new Treasurer after the RTB finding:

- Ironworkers Local 401 Political Action Fund (AF 2888) filed an Amended Statement of Organization after the RTB finding designating Charles J. Roberts as Treasurer (see first list).
- Oakland County Democratic Party (AF 2889) filed an Amended Statement of Organization after the RTB finding designating Phillip W. Reid as Treasurer (see second list).
- The Hershey Company Political Action Committee (AF 2891) filed an Amended Statement of Organization after the RTB finding designating Debra L. Miller as Treasurer (see first list).

In addition, Oakland County Democratic Party (AF 2889) made only a partial payment of the civil money penalty assessed at the RTB stage. As such, the civil money penalty is listed as not paid.

#### **RAD Recommendation**

- (1) Make a final determination that the political committees and their treasurers listed on the attached reports violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

Federal Election Commission  
FD Circulation Report - Fine Paid  
2014 PRE-GENERAL Election Sensitive 10/23/2014 UNAUTH\_M

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2882	ANN PAC		C00531764	PATRICK MCSWAIN	11/14/2014	Not Filed	\$19,224	0	12/17/2014	\$1,090	\$1,090	01/26/2015	\$1,090
2884	CONSTITUTION PARTY NATIONAL COMMITTEE		C00279802	H. JAMES HEADINGS	11/29/2014	Not Filed	\$5,785	0	12/17/2014	\$660	\$660	01/27/2015	\$660
2885	CROWLEY MARITIME CORPORATION FEDERAL PAC		C00147231	DANIEL L. WARNER	11/13/2014	Not Filed	\$1,301	0	12/17/2014	\$550	\$550	01/29/2015	\$550
2887	DUCHOSSOIS GROUP PAC		C00212308	MICHAEL E. FLANNERY	01/21/2015	Not Filed	\$5,000	0	12/17/2014	\$660	\$660	01/28/2015	\$660
2888	IRONWORKERS LOCAL 401 POLITICAL ACTION FUND		C00163535	CHARLES J. ROBERTS	11/13/2014	Not Filed	\$11,000	0	12/17/2014	\$1,090	\$1,090	01/29/2015	\$1,090
2890	STARK COUNTY REPUBLICAN PARTY		C00270934	JOYCE HUDNELL	11/04/2014	Not Filed	\$2,211	0	12/17/2014	\$550	\$550	01/21/2015	\$550
2891	THE HERSHEY COMPANY POLITICAL ACTION COMMITTEE		C00200139	DEBRA L. MILLER	10/30/2014	7	\$2,029	0	12/17/2014	\$125	\$125	01/21/2015	\$125

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2014 PRE-GENERAL Election Sensitive 10/23/2014 UNAUTH\_M

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
2889	OAKLAND COUNTY DEMOCRATIC PARTY		C00040857	PHILLIP W. REID	11/10/2014	Not Filed	\$80,869	4	12/17/2014	\$8,800	189	\$8,800



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program - Final )  
Determination Recommendation for the )  
2014 12 Day Pre-General Report )  
(Unauthorized Committees - Monthly )  
Filers): )  
ANN PAC, and MCSWAIN, PATRICK as ) AF# 2882  
treasurer; )  
CONSTITUTION PARTY NATIONAL ) AF# 2884  
COMMITTEE, and HEADINGS, H. )  
JAMES as treasurer; )  
CROWLEY MARITIME CORPORATION ) AF# 2885  
FEDERAL PAC, and WARNER, DANIEL )  
L. MR. as treasurer; )  
DUCHOSSOIS GROUP PAC, and ) AF# 2887  
FLANNERY, MICHAEL E. as treasurer; )  
IRONWORKERS LOCAL 401 ) AF# 2888  
POLITICAL ACTION FUND, and )  
ROBERTS, CHARLES J as treasurer; )  
OAKLAND COUNTY DEMOCRATIC ) AF# 2889  
PARTY, and REID, PHILLIP W. as )  
treasurer; )  
STARK COUNTY REPUBLICAN ) AF# 2890  
PARTY, and HUDNELL, JOYCE as )  
treasurer; )  
THE HERSHEY COMPANY POLITICAL ) AF# 2891  
ACTION COMMITTEE, and DEBRA L. )  
MILLER as treasurer; )

1100204127  
442114070001

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 25, 2015 the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2014 12 Day Pre-General Report (Unauthorized Committees - Monthly Filers) as recommended in the Reports Analysis Division's Memorandum dated June 24, 2015, on the following committees:

AF#2882 Decided by a vote of 6-0 to: (1) make a final determination that ANN PAC, and MCSWAIN, PATRICK as treasurer , violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2884 Decided by a vote of 6-0 to: (1) make a final determination that CONSTITUTION PARTY NATIONAL COMMITTEE, and HEADINGS, H. JAMES as treasurer , violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2885 Decided by a vote of 6-0 to: (1) make a final determination that CROWLEY MARITIME CORPORATION FEDERAL PAC, and WARNER, DANIEL L. MR. as treasurer , violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2887 Decided by a vote of 6-0 to: (1) make a final determination that DUCHOSSOIS GROUP PAC, and FLANNERY, MICHAEL E. as treasurer , violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2888 Decided by a vote of 6-0 to: (1) make a final determination that IRONWORKERS LOCAL 401 POLITICAL ACTION FUND, and ROBERTS, CHARLES J as treasurer , violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and

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assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2889 Decided by a vote of 6-0 to: (1) make a final determination that OAKLAND COUNTY DEMOCRATIC PARTY, and REID, PHILLIP W. as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2890 Decided by a vote of 6-0 to: (1) make a final determination that STARK COUNTY REPUBLICAN PARTY, and HUDNELL, JOYCE as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2891 Decided by a vote of 6-0 to: (1) make a final determination that THE HERSHEY COMPANY POLITICAL ACTION COMMITTEE, and DEBRA L. MILLER as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 26, 2015  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 26, 2015

Debra L. Miller, in official capacity as Treasurer  
The Hershey Company Political Action Committee  
100 Crystal A Drive  
Hershey, PA 17033

C00200139  
AF#: 2891

Dear Ms. Miller:

On December 17, 2014, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that The Hershey Company Political Action Committee and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for filing late or failing to file the 2014 Pre-General Report. By letter dated December 18, 2014, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$125 in accordance with the schedule of penalties at 11 CFR § 111.43.

On January 21, 2015, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on June 25, 2015 that The Hershey Company Political Action Committee and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)), assessed a civil money penalty in the amount of \$125 in accordance with 11 CFR § 111.43, and voted to close the file.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) (formerly 2 U.S.C. § 437g(a)(12)) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding this matter, please contact Sari Pickerall on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink that reads "Ann M. Ravel". The signature is fluid and cursive.

Ann M. Ravel  
Chair

FOR: The Hershey Company Political Action Committee

FEC ID#: C00200139

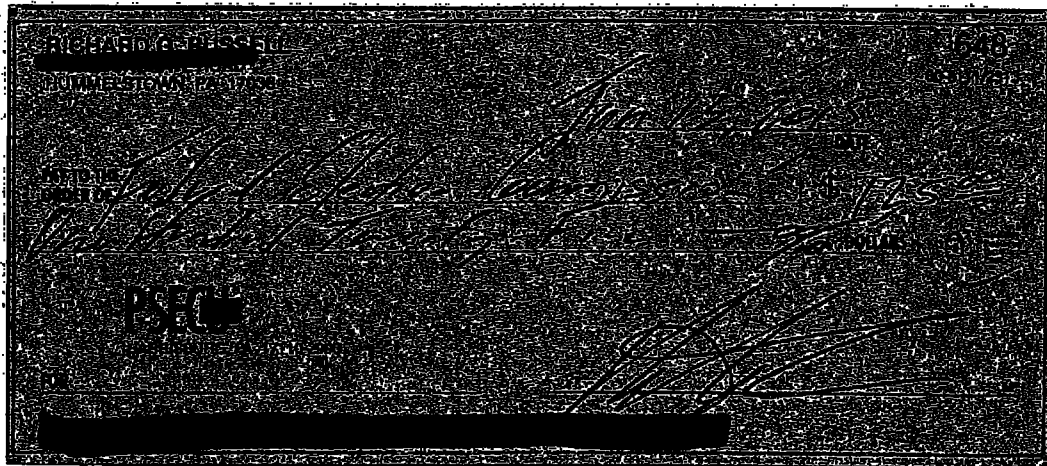
AF#: 2891

PAYMENT DUE DATE: January 26, 2015

PAYMENT AMOUNT DUE: \$125

FEDERAL ELECTION COMMISSION

Lockbox: GLX-979058 Ledger Date 01/20/2015



Batch	Item	TID	Batch Total	Amount
1	2	Y-4806699	\$1,945.00	\$125.00

usbank

St. Louis GA Lockbox  
(314) 425-1818

84114070001



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2891

DATE SCANNED 7/22/15

SCANNER NO. 2

SCAN OPERATOR Sh

1-800-438-3830